

**COPY**

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
PECOS DIVISION

UNITED STATES OF AMERICA, ) NO. P-13-CR-425  
 )  
 Plaintiff, ) I N D I C T M E N T  
 ) [Vio: 18 U.S.C. 2244(b),  
 v. ) Abusive Sexual Contact; 18  
 ) U.S.C. 2261A (1), Stalking; 18  
 ) 1001 (a) (3), False Statement  
 JOHN CHARLES ROBERTS, JR., )  
 )  
 Defendant. )

SEP 12 2013  
CLERK, U.S. DISTRICT COURT  
BY DEPUTY  
WESTERN DISTRICT OF TEXAS

**The Grand Jury Charges:**

**Count One**  
**[18 U.S.C. § 2244(b)]**

On or about February 1, 2011, in the Western District of Texas, and territorial jurisdiction of the United States, Defendant,

JOHN CHARLES ROBERTS, JR.,  
did knowingly engage in sexual contact with V1 without V1's permission.

A violation of Title 18, United States Code, Section 2244 (b).

Count Two  
[18 U.S.C. § 2261A (1)]

On or about February 1, 2011, in the Western District of Texas and territorial jurisdiction of the United States, Defendant,

JOHN CHARLES ROBERTS, JR.,

traveled in Big Bend National Park with the intent to harass or intimidate another person, V1, and in the course of and as a result of such travel, caused substantial emotional distress to V1.

A violation of Title 18, United States Code, Section 2261A (1).

**Count Three**  
[18 U.S.C. § 2261A(1)]

On or about February 1, 2011, in the Western District of Texas and territorial jurisdiction of the United States, Defendant,

JOHN CHARLES ROBERTS, JR.,

traveled in Big Bend National Park with the intent to harass or intimidate another person, V2, and in the course of and as a result of such travel, caused substantial emotional distress to V2.

A violation of Title 18, United States Code, Section 2261A(1).

**Count Four**  
[18 U.S.C. § 2261A(1)]

On or about February 1, 2011, in the Western District of Texas and territorial jurisdiction of the United States, Defendant,

JOHN CHARLES ROBERTS, JR., traveled in Big Bend National Park with the intent to harass or intimidate another person, V3, and in the course of and as a result of such travel, caused substantial emotional distress to V3.

All in violation of Title 18, United States Code, Section 2261A(1).

Count Five  
[18 U.S.C. § 2261A(1)]

At the specific date unknown, between on or about May 2, 2011 and September 12, 2011, in the Western District of Texas and territorial jurisdiction of the United States, Defendant,

JOHN CHARLES ROBERTS, JR.,

traveled in Big Bend National Park with the intent to harass or intimidate another person, V4, and in the course of and as a result of such travel, caused substantial emotional distress to V4.

A violation of Title 18, United States Code, Section 2261A(1).

**Count Six**  
[18 U.S.C. § 2261A(1)]

On or about December 31, 2011, in the Western District of Texas and territorial jurisdiction of the United States, Defendant,

JOHN CHARLES ROBERTS, JR., traveled in Big Bend National Park with the intent to harass or intimidate another person, V5, and in the course of and as a result of such travel, caused substantial emotional distress to V5.

A violation of Title 18, United States Code, Section 2261A(1).

**Count Seven**  
[18 U.S.C. § 1001(a)(3)]

On or about May 11, 2009, in the Western District of Texas,  
Defendant,

JOHN CHARLES ROBERTS, JR.,

did willfully and knowingly make and cause to be made, and use  
and cause to be used, in a matter within the Department of  
Interior, a department or agency of the United States, a false  
writing or document, knowing the same to contain a materially  
false, fictitious, and fraudulent statement. JOHN CHARLES  
ROBERTS, JR., submitted an Optional Form 306 dated May 11, 2009,  
and failed to completely answer Question 8 when he omitted his  
service in the United States Navy and his uncharacterized  
discharge as indicated on the Defendant's Certificate of Release  
or Discharge From Active Duty, Department of Defense Form 214.

A violation of Title 18, United States Code, Section 1001  
(a)(3).

Count Eight  
[18 U.S.C. §§ 1001(a)(3)]

On or about June 27, 2010, in the Western District of Texas, Defendant,

JOHN CHARLES ROBERTS, JR.,

did willfully and knowingly make and cause to be made, and use and cause to be used, in a matter within the Department of the Interior, a department or agency of the United States, a false writing or document, knowing the same to contain a materially false, fictitious, and fraudulent statement. JOHN CHARLES ROBERTS, JR., submitted an Optional Form 306 dated June 27, 2010, and, when asked on question 8, "Have you ever served in the United States Military? If you answered "YES" list the branch, dates, and type of discharge for all active duty," when in fact the Defendant characterized his U.S. Navy discharge as "Honorable", when the Defendant knew that his discharge was "Uncharacterized" as noted in his Certificate of Release or Discharge From Active Duty, Department of Defense Form 214.

A violation of Title 18, United States Code, Section 1001 (a)(3).

**Count Nine**  
**[18 U.S.C. § 1001(a)(3)]**

On or about November 21, 2010, in the Western District of Texas, Defendant,

JOHN CHARLES ROBERTS, JR.,

did willfully and knowingly make and cause to be made, and use and cause to be used, in a matter within the Department of the Interior, a department or agency of the United States, a false writing or document, knowing the same to contain a materially false, fictitious, and fraudulent statement. JOHN CHARLES ROBERTS, JR., submitted an Optional Form 306 dated November 21, 2010, and failed to completely answer Question 8 when he omitted his service in the United States Navy and his uncharacterized discharge as indicated on the Defendant's Certificate of Release or Discharge From Active Duty, Department of Defense Form 214.

A violation of Title 18, United States Code, Section 1001 (a)(3).

Count Ten  
[18 U.S.C. § 1001(a)(3)]

On or about July 20, 2010, in the Western District of Texas, Defendant,

JOHN CHARLES ROBERTS, JR.,

did willfully and knowingly make and cause to be made, and use and cause to be used, in a matter within the Department of the Interior, a department or agency of the United States, a false writing or document, knowing the same to contain a materially false, fictitious, and fraudulent statement. JOHN CHARLES ROBERTS, JR., submitted a Questionnaire for National Security Positions Form SF86 dated July 20, 2010, the Defendant, responded to Question 2 of Section 15, that he received an "Honorable" discharge from the United States Navy, when he knew that his discharge was "Uncharacterized" due to being separated from the United States Navy for a personality disorder as depicted in the Defendant's Certificate of Release or Discharge Form Active Duty, Department of Defense Form 214.

A violation of Title 18, United States Code, Section 1001 (a)(3).

**True Bill.**

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Foreperson

ROBERT PITMAN  
United States Attorney

*S. Stewart*

SANDY STEWART  
Assistant United States Attorney